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1 JOHN R. ROBERTS  
2 Bankruptcy Trustee  
3 P.O. Box 1506  
4 Placerville, CA 95667-1506  
5 (530) 626-6441

6 UNITED STATES BANKRUPTCY COURT

7 FOR THE EASTERN DISTRICT OF CALIFORNIA

8 IN RE:

9 CASE NO. 09-33295-C-7

10 RONALD LEWIS KAYLOR

11 Debtor(s). / DC NO. JRR-2  
12 DATE: FEBRUARY 9, 2010  
TIME: 9:30 A.M.  
COURTROOM: 35

13 TRUSTEE'S MOTION FOR SALE OF ASSETS FREE AND  
14 CLEAR OF LIENS AND ENCUMBRANCES

15 The Motion of JOHN R. ROBERTS, as Trustee of the estate of the above-named  
16 debtor, respectfully represents:

17 1. That movant is the duly elected, qualified and acting Trustee of the estate  
18 of the above-named debtors

19 2. That movant has, as such Trustee, possession of the following asset  
20 belonging to the debtors' estate:

21 COMMERCIAL BUILDING COMMONLY KNOWN AS  
22 2555 HIGHWAY 158, JUNE LAKE, CA 93529  
23 APN: 015085010000

24 3. That it is in the best interest of the estate that said asset be sold in that it  
will generate cash for the estate and said sale is for the fair market value.

25 4. The Trustee has received an offer from EDWARD SUSZYNISKI AND  
26 ALICE S. SUSZYNISKI, no relationship to the debtor, for the sum of \$165,000.00, cash  
27 as evidenced by the Commercial Property Purchase Agreement and Joint Escrow  
28 Instructions to the Exhibits and marked as **Exhibit "A"**.

1       5. Any costs to be paid will be paid as agreed upon in the attached offer.

2       6. An escrow has been opened at OLD REPUBLIC TITLE CO., escrow  
3 number 2123008868-KDD and a \$8,250.00 deposit has been placed with said title  
4 company.

5       7. The Deed of Trust holder, MICHAEL A. PINIZZOTTO and NANCY J.  
6 PINIZZOTTO, in the approximate sum of \$108,000.00, real property taxes, utility liens  
7 and county liens will be paid from the escrow, as applicable, along with real estate  
8 commissions and the usual and customary escrow and title fees. The bankruptcy  
9 estate will receive approximately \$33,211.56. A copy of the estimated closing  
10 statement is attached to the Exhibits as Exhibit "B".

11       WHEREFORE, Trustee prays for an Order from this Court allowing him to sell  
12 the asset as described herein free and clear of liens and encumbrances.

13  
14 DATED: January 5, 2010

15       /s/ JOHN R. ROBERTS, TRUSTEE  
16                    PO Box 1506  
17                    Placerville, CA 95667  
18                    530-626-6441  
19                    court@bankruptcy-info.com  
20                    State Bar No. 77919